

THE HEED LAW GROUP

39555 Orchard Hill Place, Suite 600
Novi, Michigan 48375
Phone: (248) 465-8655
Fax: (734) 971-5564

June 6, 2016

BY ECF

Honorable Magistrate James C. Francis
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: *Lifeguard Licensing Inc., v. Ann Arbor T-Shirt Company*, No. 15-cv-08459
(LGS)(JCF): Letter Motion for an Extension of Time

Dear Judge Francis:

We and the firm of Kleinberg, Kaplan, Wolff, and Cohen P.C. represent the Defendants Ann Arbor T-Shirt Co. LLC, Jerry Kozak, and Richard Winowiecki in the above-referenced proceeding.

As Your Honor may be aware, Defendants have now filed their Answer, Affirmative Defenses, and Counterclaims [Dkt. 77].

In accordance with the Court's Memorandum and Order dated May 23, 2016 ("Order on Motion to Compel") [Dkt. 73] counsel have met and conferred several times regarding the scope of discovery and Plaintiff's objections to Defendants' first set of document requests. During those meet and confer sessions, Plaintiffs suggested that Defendants serve renewed document requests on the Plaintiffs in conjunction with the filing of the Answer, Affirmative Defenses, and Counterclaims (the "Renewed Document Requests") and Defendants' counsel subsequently indicated that they would do so. Plaintiffs' counsel consented to electronic service of the Renewed Document Requests, on the condition that Plaintiffs be afforded thirty-five (35) days to respond.

The Renewed Document Requests were electronically served today. Accordingly, we write to request that the Court grant the Plaintiffs until July 11, 2016 to respond to the Renewed Document Requests, as well as conduct the further searches and produce the documents required by the Court's Order on Motion to Compel.

Both parties agree to this course of action. This is Defendants' first request for an extension of the deadlines set forth in the Order on Motion to Compel.

Very truly yours,

HEED LAW GROUP PLLC

/s/ Thomas P Heed

Thomas P. Heed
39555 Orchard Hill Place, Suite 600
Novi, Michigan 48375
Telephone: (248) 465-8655
Facsimile: (248) 348-5760
theed@heedlawgroup.com

KLEINBERG, KAPLAN, WOLFF &
COHEN, P.C.

Norris D. Wolff
Joshua K. Bromberg
551 Fifth Avenue, 18th Floor
New York, New York 10176
Telephone: (212) 986-6000
Facsimile: (212) 986-8866

Attorneys for Defendants
**ANN ARBOR T-SHIRT CO. LLC,
JERRY KOZAK, and RICHARD
WINOWIECKI**

Cc: Counsel to Plaintiffs (by ECF)